

### **REMARKS**

This amendment is in response to the Official Action dated October 18, 2007. Claim 14 has been amended, claims 1-9, 15, and 16 have been canceled, and claims 19-29 have been added; as such claims 10-14 and 17-29 are now pending in this application. Claims 10, 13, 14, 19 and 25 are independent claims. Reconsideration and allowance is requested in view of the claim amendments and the following

Claim 14 has been amended to include the subject matter of claims 15 and 16. Claims 19-29 include subject matter from former claims 1-9 as well as subject matter from Fig. 1, and paragraphs 53, 58, and 61-69 (*See* U.S. Patent Pub. 2004/0249861 of the Present Application).

#### **Rejections under 35 U.S.C. § 112**

Claims 1-9 have been rejected under 35 U.S.C. §112 for failing to recite critical structural elements. Claims 1-9 have been cancelled.

Therefore, withdrawal of these rejections is respectfully requested.

#### **Example Embodiment**

Fig. 1 illustrates an example embodiment of the present invention directed to an imaging system. The imaging system includes an imaging apparatus 10 (e.g., a camera), camera control unit 20, meta-data addition apparatus 40, a videotape recorder 50, meta-data synthesis apparatus 60, sound recorder 18, display 70, and input terminal 30. Imaging apparatus 10 produces a video signal that passes to meta-data addition apparatus 40 via camera control unit 20. Imaging apparatus 10 may include a lens 12 and a dolly 14. The lens 12 and dolly 14 maintain setting information, which is passed to the meta-data addition apparatus. Dolly 14 serves to position and track the location of imaging apparatus 10. Data input terminal 30 also provides meta-data associated with a current video signal. The meta-data addition apparatus 40 may combine various meta-data from the lens 12, dolly 14, and data input terminal 30 with the video signal received from the camera control unit to produce a combined video signal. Videotape recorder 50 records the combined video signal and

data from sound recorder 18. The combined video from the videotape recorder may pass to meta-data synthesis apparatus 60, which may synthesize the meta-data and video signal, superimposing the meta-data on the video signal and passing the synthesized video signal to display 70. Display 70 may or may not be part of the imaging apparatus 10. The synthesized video allows a user to view a synthesized video, and thereby monitor various settings and conditions of the imaging apparatus and video signal.

Rejections under 35 U.S.C. § 102

*Claims 1, 3-6, 8-12, 14, and 16-18 have been rejected under 35 U.S.C. § 102 as being anticipated by US patent publication 2002/00198332 Hanamoto et al. ("Hanamoto").*

Claims 1-9, 15, and 16 have been canceled. Applicant traverses the rejections as they pertain to the remaining claims.

"A claim is anticipated only if each and every element as set forth in the claim is found, either expressly or inherently described, in a single prior art reference."  
*Verdegaal Bros. v. Union Oil Co. of California*, 814 F.2d 628, 631 (Fed. Cir. 1987).

The elements must be arranged as required by the claim, but this is not an ipsissimis verbis test, i.e., identity of terminology is not required.  
*In re Bond*, 910 F.2d 831 (Fed. Cir. 1990).

"When a claim covers several structures or compositions, either generically or as alternatives, the claim is deemed anticipated if any of the structures or compositions within the scope of the claim is known in the prior art."  
*Brown v. 3M*, 265 F.3d 1349, 1351, 60 USPQ2d 1375, 1376 (Fed. Cir. 2001)

"The identical invention must be shown in as complete detail as is contained in the ... claim."  
*Richardson v. Suzuki Motor Co.*, 868 F.2d 1226, 1236 (Fed. Cir. 1989).

Hanamoto discloses an imaging apparatus for capturing media (i.e., image and/or video) files and storing related meta-data associated with each resulting image (¶34, Fig. 2B). In particular, Hanamoto relates to image and video capture device in wide domestic use (¶2). The meta-data comprises two separate parts. The first part consists of meta-data appended to the media file, which provides location information and/or identifies a second meta-data (e.g., by file name);

the second part consists of meta-data which is kept independent of the media file and includes additional information relating to an image (Fig. 2B). Each media file in Hanamoto includes a single pair of meta-data portions: the appended, first part and the independent, second part.

Claim 10 recites: *[a] video-signal recording/reproduction apparatus comprising:*

*a recording/reproduction unit for recording and reproducing a video signal generated by an imaging apparatus as a video signal with every frame thereof including additional meta data related to said video signal onto and from a recording medium; and*

*a meta-data synthesis apparatus for extracting at least a part of said meta data from said video signal including said meta data added to every frame and synthesizing said extracted part with said video signal.*

Hanamoto does not teach or suggest “*a recording/reproduction unit for recording and reproducing a video signal generated by an imaging apparatus as a video signal with every frame thereof including additional meta data related to said video signal onto and from a recording medium.*”

Hanamoto does not associate meta-data instances with individual video frames. This is evident in Fig. 12A, where Hanamoto addresses the addition of meta-data to movie files. At best, Hanamoto discloses that a given movie file may include multiple instances of meta-data, as shown in Fig. 12B, to describe partial pieces of the video. However, even in this case the meta-data is not associated with every frame (§ 118).

Furthermore, Hanamoto does not teach or suggest “*a meta-data synthesis apparatus for extracting at least a part of said meta data from said video signal including said meta data added to every frame and synthesizing said extracted part with said video signal.*”

*Nowhere*

~~No~~ where does Hanamoto disclose that the meta-data is extracted and synthesized with the video as disclosed in claim 10. Fig. 14 and 15 of the present specification illustrate a synthesized video including extracted meta-data in the form of a scene, take, shutter speed, zoom, and movement speed information. Hanamoto does not disclose a synthesis apparatus for extracting

meta-data and overlaying it on the frames of the video image. Hanamoto only discusses using the meta-data to store and search image and video data. Hanamoto not disclose combining the image and meta-data into a synthesized video signal.

Amended claim 14 recites: *[a] meta-data display method for displaying meta data related to a video signal generated by an imaging apparatus, said meta-data display method comprising the steps of:*

*extracting at least a part of said meta data added to said video signal of every frame from said video signal and synthesizing said extracted part with said video signal; and displaying said video signal including said synthesized meta data on a display apparatus;*

*wherein:*

*said display apparatus is provided in said imaging apparatus; and said meta data added to said video signal includes scene-information meta data, which is meta data related to a scene shot by said imaging apparatus.*

With respect to claim 14, Applicant submits that Hanamoto does not teach or suggest “*said meta data added to said video signal of every frame from said video signal,*” for the reasons set forth above. Furthermore, Applicant submits that Hanamoto does not teach or suggest “*said display apparatus is provided in said imaging apparatus.*”

Hanamoto only discloses the use of meta-data to produce albums and search pictures using the terms set forth in the meta-data. However, Hanamoto does not disclose that the display apparatus is a part of the imaging apparatus.

Hanamoto, therefore, fails to teach or suggest various features of independent claims 10 and 14. Furthermore, at least for the reason disclosed above claims 17 and 18 overcome Hanamoto because they depend on independent claim 14.

Accordingly, Applicant respectfully requests that the rejection of independent claim 10, 14, 17, and 18 under 35 U.S.C. § 102(b) be withdrawn.

*Claims 1, 2, 7, and 13-16 have been rejected under 35 U.S.C. § 102 as being anticipated by US patent number 6,954,319 to Yanagita et al. ("Yanagita").*

Claims 1-9, 15, and 16 have been canceled. Applicant traverses the rejections as they pertain to the remaining claims.

Yanagita discloses a system for recording video from an imaging device (i.e., camera) and storing it on to a videotape recorder, and displaying the resulting video. Yanagita's system includes meta-data in the recorded video signal. However, Yanagita does not use the video signal as the source of the meta-data that is provided to the display on the camera. Yanagita explains that there is no need to read the material from the video (col. 1, ll. 32-46). Instead, Yanagita keeps the meta-data from the video in RAM 22, and combines it with the video from the imaging device.

Claim 13 recites: *[a]n imaging apparatus comprising:  
an imaging unit for taking an image of an object and generating a video signal representing said image; and  
a display unit for displaying said video signal,  
wherein said imaging apparatus is connected to a meta-data synthesis apparatus of which at least a part of meta data related to said video signal is extracted from said video signal including said meta data added to every frame and synthesized with said video signal, and said imaging apparatus receives from said meta-data synthesis apparatus said video signal including said synthesized meta data and displays said video signal on said display unit.*

With respect to claim 13, Yanagita does not teach or suggest a "video signal including said meta data added to every frame." That is, like Hanamoto, Yanagita does not explicitly state that the video signal is such that meta data is incorporated into every frame of the video.

Yanagita does not teach or suggest "said imaging apparatus receives from said meta-data synthesis apparatus said video signal including said synthesized meta data and displays said video signal on said display unit." That is, in Yanagita, the meta-data from the video is not used to feed the display device. This is confirmed by the background section that asserts, that when the meta-data must be read from the video device it cannot be used to its full performance (i.e., benefit). As

such, the display device simply uses the meta-data in the RAM 22 as the source of the meta-data, not the meta-data on the record.

Amended claim 14 recites: *[a] meta-data display method for displaying meta data related to a video signal generated by an imaging apparatus, said meta-data display method comprising the steps of:*

*extracting at least a part of said meta data added to said video signal of every frame from said video signal and synthesizing said extracted part with said video signal; and displaying said video signal including said synthesized meta data on a display apparatus;*

*wherein:*

*said display apparatus is provided in said imaging apparatus; and said meta data added to said video signal includes scene-information meta data, which is meta data related to a scene shot by said imaging apparatus.*

With respect to claim 14, Yanagita does not disclose that “*said meta data added to said video signal includes scene-information meta data, which is meta data related to a scene shot by said imaging apparatus.*” Col. 8, lines 38 to 50 discloses the type of meta-data stored in the magnetic tape disclosed in Yanagita. Due to the specific formatting requirements disclosed in Yanagita regarding the format of the magnetic tape, the meta-data written to magnetic tape is limited particularly to areas of 44 bytes the information in Fig. 8 illustrates the type of meta-data stored in the magnetic tape.

Yanagita therefore fails to teach or suggest various features of independent claims 13 and 14. Furthermore, at least for the reason disclosed above claims 17 and 16 overcome Yanagita because they depend on independent claim 14.

Accordingly, Applicant respectfully requests that the rejection of claims 13, 14, 17, and 18 under 35 U.S.C. § 102(e) be withdrawn.

**CONCLUSION**

In view of the above amendment, applicant believes the pending application is in condition for allowance.

Applicant believes no fee is due with this response. However, if a fee is due, please charge our Deposit Account No. 18-0013, under Order No. SON-2972 from which the undersigned is authorized to draw.

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Respectfully submitted,

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